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District of Nevada

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SHANNEN BRADLEY, individually and as)	
Personal Representative of the Estate of)	
RICHARD WILLIAMS, deceased, SEAN)	Case No. 2:12-cv-01526-APG-GWF
WILLIAMS and PATRICK WILLIAMS,)	
)	
Plaintiffs,)	
)	
v.)	
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	

UNOPPOSED MOTION FOR EXTENSION OF TIME OF DISCOVERY DEADLINES
(Fourth Request)

The United States of America ("United States") respectfully requests an extension of time of thirty (30) days for all remaining discovery deadlines in order to allow the parties to complete settlement discussions that have been ongoing.

In support of the instant Motion, the United States submits the following:

1. This Motion is brought in order to accommodate the undersigned counsel for the United States.

1 2. On January 29, 2014, the current Scheduling Order was granted by the Court (ECF
2 #43) setting revised discovery deadlines. Since that time, the parties have been discussing a possible
3 settlement in this case. Although discussions are continuing, they will not conclude before some of
4 the discovery deadlines must be met. Specifically, over the course of the parties' settlement
5 discussions a new issue has arisen that is quite complex and will require additional time to evaluate,
6 resolve, and determine its application to the settlement value of this case.

7 3. Undersigned counsel and Plaintiff's counsel have agreed a thirty (30) day extension of
8 time is needed, and that postponing the remaining discovery deadlines during this period of time is in
9 the best interest of both parties.

10 4. The following deadlines would apply:

- 11 a. Discovery ends **July 30, 2014.**
- 12 b. Expert disclosures due **June 2, 2014.**
- 13 c. Rebuttal experts due **July 2, 2014.**
- 14 d. Dispositive motions due **August 29, 2014.**
- 15 e. Joint Pretrial Order due **October 1, 2014.**

16 5. The instant motion is filed in good faith and not for the purposes of delay.

17 WHEREFORE, for the above reasons, the United States respectfully requests the instant
18 Motion extending time of all discovery deadlines for thirty (30) days be granted.

19 Respectfully submitted this 10th day of April 2014.

20 DANIEL G. BOGDEN
21 United States Attorney

22 /s/ Justin E. Pingel
23 JUSTIN E. PINGEL
24 Assistant United States Attorney

25 IT IS SO ORDERED:

26 George Foley Jr.
27 GEORGE FOLEY, JR.
28 United States Magistrate Judge
29 DATED: April 11, 2014